

# ANCHORAGE WATER & WASTEWATER UTILITY



George P. Wuerch,  
Mayor

## Treatment Division

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Owned by the  
Municipality of Anchorage

June 6, 2002

U.S. Environmental Protection Agency, Region 10  
NPDES Compliance Unit  
1200 Sixth Avenue, OW-133  
Seattle, Washington 98101

### Subject: Fecal Coliform Limit

The John M. Asplund Water Pollution Control Facility, NPDES Permit No. AK-002255-1, has a fecal coliform limit that reads "Not more than 10% of the samples shall exceed 2600 FC MPN/mL." (Reference permit Part I.A.4. Table 1, footnote 2 - p. 4 of 39.) I suspect that this may be an error in the permit and that it was intended that the limit be 2600 FC MPN/100 mL. This was the limit in the preceding permit prior to the June 2000 reissuance. A review of the fact sheet and the draft permit for the 2000 reissuance seems to indicate that the intention was to carry over this limit unchanged to new permit.

Two samples during May 2002 exceeded 2600 FC MPN/100 mL:

May 9, 2002:	>24,000 FC MPN/100 mL
May 21, 2002:	5400 FC MPN/100 mL

**These samples do not exceed the "not more than 10%" permit limit of 2600 FC MPN/mL. Therefore, this has not been reported as an exceedance on the DMR.** However, they are being reported because of the suspected error in the permit. This is the fourth time under the new permit that this situation has occurred. It occurred in October 2000, January 2002, and February 2002. A letter was sent to your office with the DMR each time reporting the results and explaining the situation with the permit limit.

These higher than normal levels of fecal coliform resulted from adjustment of a recently installed Oxidation Reduction Potential (ORP) Chlorine Feed Control System. Our goal in installing this control system is to effectively meet permit limits while minimizing chlorine usage. We expected that during start-up and adjustment of the ORP that exceedances of the residual or coliform permit limits might occur. We will continue to do our best to avoid any exceedances.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

I can be contacted at (907) 564-2799 should you have any questions.

Sincerely,



J. Kris Warren

Manager, Treatment Division

Cc: Alaska Department of Environmental Conservation, Division of Air & Water Quality  
Mark Spano, Water Quality Supervisor, AWWU  
Jack Knue, General Foreman, John M. Asplund WPCF, AWWU